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June 15, 2022

Via ECF

The Honorable Brian M. Cogan
United States District Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Genaro Garcia Luna*, 19 Cr. 576 (BMC)

Dear Judge Cogan,

On behalf of Genaro Garcia Luna, we write to inform the Court that at this time the defense does not have any motions *in limine*. At this point the defense is trying to get a better understanding of the specific criminal conduct Mr. Garcia Luna is alleged to have been party. To that end, on April 15, 2022, the defense served a request on the government for particulars regarding the charges alleged in the indictment as they relate to Mr. Garcia Luna and for materials favorable to the defense pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963) and Federal Rule of Criminal Procedure 5(f). The government has made some disclosures in response to those requests, and it is our understanding that they are in the process of continuing to produce material responsive to those requests. We anticipate being in position to file motions *in limine* at a later date after we receive and review more particularized information from the government.

Respectfully submitted,

/s/

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cc: Erin M. Reid
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(Assistant United States Attorneys via ECF)